AIR QUALITY PERMIT

Issued To: A.M.Welles, Inc.
PO Box 2808
Norris, MT 59745

Permit #3804-00
Application Complete: 4/03/06
Preliminary Determination Issued: 4/20/06
Department Decision Issued: 5/8/06
Permit Final: 05/24/06
AFS #777-3804

An air quality permit, with conditions, is hereby granted to A.M.Welles, Inc. (A.M.Welles), pursuant to Sections 75-2-204 and 211, Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq*., as amended, for the following:

Section I: Permitted Facilities

A. Permitted Equipment

A.M.Welles operates a portable crushing/screening facility at various locations throughout Montana. A complete list of the permitted equipment is contained in Section I.A of the permit analysis.

B. Plant Location

A.M.Welles operates a portable crushing/screening facility that will initially be located in Sections 17 and 18, Township 1 South, Range 5 East, in Gallatin County, Montana in the town of Belgrade. However, Permit #3804-00 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department)-approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of nonattainment areas for particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}). *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* A.M.Welles will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of PM_{10} nonattainment areas.

Section II: Limitations and Conditions

A. Operational Limitations and Conditions

1. A.M.Welles shall not cause or authorize to be discharged into the atmosphere, from any Standards of Performance for New Stationary Source (NSPS)-affected crusher, any visible emissions that exhibit an opacity of 15% or greater averaged over 6 consecutive minutes (ARM 17.8.340 and 40 Code of Federal Regulations (CFR), Subpart OOO).

2. A.M.Welles shall not cause or authorize to be discharged into the atmosphere from any other NSPS-affected equipment, such as screens or conveyor transfers, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.340, ARM 17.8.752, and 40 CFR 60, Subpart OOO).

3. A.M.Welles shall not cause or authorize to be discharged into the atmosphere, from any non-NSPS-affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308 and ARM 17.8.752).

4. Water and water spray bars shall be available on site at all times and operated, as

necessary, to maintain compliance with the opacity limitations in Sections II.A.1, II.A.2, and II.A.3 (ARM 17.8.752).

5. A.M.Welles shall not cause or authorize to be discharged into the atmosphere from any street, road, or parking lot any visible fugitive emissions that exhibit an opacity of 20% or greater (ARM 17.8.308 and ARM 17.8.752).

6. A.M.Welles shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).

7. A.M.Welles shall not operate more than three crushers at any given time and the maximum combined rated design capacity of the crushers shall not exceed 800 tons per hour (TPH) (ARM 17.8.749).

8. Crusher production from the facility shall be limited to 7,008,000 tons during any rolling 12-month time period (ARM 17.8.749).

9. A.M.Welles shall not operate more than three screens at any given time and the maximum combined rated design capacity of the screens shall not exceed 800 TPH (ARM 17.8.749).

10. Total combined screen production from the facility shall be limited to 7,008,000 tons during any rolling 12-month time period (ARM 17.8.749).

11. A.M.Welles shall not operate more than one diesel generator at any given time and the maximum rated design capacity shall not exceed 850 kilowatts (kW) and shall not exceed 6000 hours during any rolling 12-month time period (ARM 17.8.749).

12. If the permitted equipment is used in conjunction with any other equipment owned or operated by A.M.Welles, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons of emissions during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).

13. A.M.Welles shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart OOO for any applicable crushing/screening operation and associated equipment (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

B. Testing Requirements

1. Within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup, an Environmental Protection Agency (EPA) Method 9 opacity test and/or other methods and procedures, as specified in 40 CFR Part 60.675, must be performed on any NSPS affected equipment to demonstrate compliance with the emissions limitations contained in Sections II.A.1 and II.A.2 (ARM 17.8.340, 40 CFR Part 60, Subpart A and Subpart OOO).

2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. If this portable crushing/screening plant is moved to another location, an Intent to Transfer Form must be sent to the Department. In addition, a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).

2. A.M.Welles shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. All records compiled in accordance with this permit shall be maintained by A.M.Welles as a permanent business record for at least 5 years following the date of the measurement, must be submitted to the Department upon request, and must be available at the plant site for inspection by the Department (ARM 17.8.749).

3. A.M.Welles shall supply the Department with annual production information for all emission points, as required, by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the most recent emission inventory report and sources identified in Section I.A of the permit analysis.

   Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in units as required by the Department. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

4. A.M.Welles shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to start-up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).

5. A.M.Welles shall document, by month, the crushing production from the facility. By the 25th day of each month, A.M.Welles shall calculate the crushing production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.8. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

6. A.M.Welles shall document, by month, the screening production from the facility. By the 25th day of each month, A.M.Welles shall calculate the screening production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.10. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

7. A.M.Welles shall document, by month, the hours of operation of the diesel engine/generator. By the 25th day of each month, A.M.Welles shall total the hours of operation of the diesel engine/generator during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.11. The information for each of the previous months shall be submitted along with the annual emissions inventory (ARM 17.8.749).

8. A.M.Welles shall annually certify that its emissions are less than those that would require the facility to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

Section III: General Conditions

A. Inspection - A.M.Welles shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

B. Waiver - The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if A.M.Welles fails to appeal as indicated below.

C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving A.M.Welles of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.740, *et seq*. (ARM 17.8.756).

D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 *et seq*., MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders it's decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

F. Permit Inspection - As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.

G. Permit Fees - Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by A.M.Welles may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

H. Construction Commencement - Construction must begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked (ARM 17.8.762).

I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.

J. A.M.Welles shall comply with the conditions contained in this permit while operating at any location in Montana, except within those areas having a Department-approved permitting program.

PERMIT ANALYSIS
A.M.Welles, Inc.
Permit Number 3804-00

I. Introduction/Process Description

A. Permitted Equipment

A.M.Welles, Inc. (A.M.Welles) owns and operates a portable crushing/screening facility consisting of the following equipment:

- 2005 Jaw Crusher with screen (400 tons per hour (TPH)),
- 2005 Cone crushers with screens (2 @ 200 TPH each),
- 850 kilowatt (kW) diesel generator (circa mid-1980's), and
- associated equipment.

The proposed initial location for the facility is located in Sections 17 and 18, Township 1 South, Range 5 East, in Gallatin County, Montana. Permit #3804-00 will apply to the source while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department)-approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of nonattainment areas for particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}). *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* A.M.Welles will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of PM_{10} nonattainment areas.

B. Process Description

A.M.Welles proposes to use this crushing/screening plant and associated equipment to crush sand and gravel materials for use in various construction operations. For a typical operational setup, materials are loaded into the crushing/screening plant by a feeder, transferred by conveyor, and passed through the jaw crusher. Materials are crushed by the crusher and sent to the screens. Materials are screened, separated, and sent to stockpile for sale and use in construction operations, or conveyed for further size reduction by one of two cone crushers/screen units.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 - General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this subchapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq*., Montana Code Annotated (MCA).

   A.M.Welles shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, Subchapter 2 - Ambient Air Quality, including, but not limited to:

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM_{10}

A.M.Welles must comply with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.

2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, A.M.Welles shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Processes. This rule requires that

no person shall cause or allow to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.

5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.

6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.

7. ARM 17.8.340 Standards of Performance for New Stationary Sources. This rule incorporates, by reference, 40 Code of Federal Regulations (CFR) 60, Standards of Performance for New Stationary Sources (NSPS). The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, NSPS, shall comply with the standards and provisions of 40 CFR Part 60.

   In order for a crushing/screening plant to be subject to NSPS requirements, two specific criteria must be met. First, the plant must meet the definition of an affected facility under 40 CFR Part 60 Subpart OOO and have a capacity greater than 150 TPH, and second, the equipment in question must have been constructed, reconstructed, or modified after August 31, 1983. A.M.Welles is subject to NSPS for the crushing/screening plant since the equipment is capable of processing more than 150 TPH and was manufactured in 2005 (40 CFR Part 60, Subpart A-General Provisions, and Subpart OOO-Non-Metallic Mineral Processing Plants).

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that A.M.Welles submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. A.M.Welles submitted the required permit application fee for the current permit action.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department. This operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

   An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

E. ARM 17.8, Subchapter 7 - Permit, Construction, and Operation of Air Contaminant

Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a facility to obtain an air quality permit or permit alteration to construct, alter, or use any asphalt plant, crusher, or screen that has the Potential to Emit (PTE) greater than 15 tons per year of any pollutant. A.M.Welles has a PTE greater than 15 tons per year of total particulate matter (PM), PM_{10}, and oxides of nitrogen (NO_x); therefore, an air quality permit is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit Program.

4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. A.M.Welles submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. A.M.Welles submitted an affidavit of publication of public notice for the March 17, 2006, issue of the *Bozeman Daily Chronicle*, a newspaper of general circulation in the city of Belgrade in Gallatin County, as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that Best Available Control Technology (BACT) shall be utilized. The required BACT analysis is included in Section IV of this permit analysis.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving A.M.Welles of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.

12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of A.M.Welles, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of Intent to Transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

   This facility is not a major stationary source because it is not a listed source and does not have a PTE greater than 250 tons per year (excluding fugitive emissions) of any air pollutant.

G. ARM 17.8, Subchapter 12 - Operating Permit Program Applicability, including, but not

limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:

   a. PTE > 100 tons/year of any pollutant.

   b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule.

   c. PTE > 70 tons/year of PM_{10} in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #3804-00 for the A.M.Welles facility, the following conclusions were made:

   a. The facility's PTE is less than 100 tons/year for any pollutant, after control.

   b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year of all HAPs.

   c. This source is not located in a serious PM_{10} nonattainment area.

   d. This facility is not subject to any current NESHAP standards.

   e. The facility is currently subject to NSPS standards (40 CFR 60, Subpart A, General Provisions, and Subpart OOO, Non-Metallic Mineral Processing Plants).

   f. This source is not a Title IV affected source nor a solid waste combustion unit.

   g. This source is not an EPA designated Title V source.

      A.M.Welles's crushing/screening facility is not subject to Title V Operating Permit requirements because the source's PTE is restricted to below the major source threshold. Based on these facts, the Department determined that this facility would be a minor source of emissions, as defined under the Title V Operating Permit Program. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, A.M.Welles may be required to obtain an operating permit.

   h. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations that limit that source's potential to emit.

      i. In applying for an exemption under this rule, the owner or operator of the source shall certify to the Department that the source's potential to emit does not require the source to obtain an air quality operating permit.
      ii. Any source that obtains a federally enforceable limit on potential to emit shall annually certify that its actual emissions are less than those

that would require the source to obtain an air quality operating permit.

The Department determined that the annual reporting requirements contained in the permit are sufficient to satisfy this requirement.

3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness. The compliance certification submittal required by ARM 17.8.1204(3) shall contain a certification of truth, accuracy, and completeness by a responsible official. This certification and information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III. BACT Analysis

A BACT determination is required for any new or altered source. A.M.Welles shall install on the new or altered source the maximum air pollution control capability that is technologically practicable and economically feasible, except that BACT shall be used.

A. Area Source Fugitive Emissions and Crushing/Screening Emissions

Two types of emissions controls are readily available and used for dust suppression of fugitive emissions at the site, fugitive emissions for the surrounding area of operations, and for equipment emissions from the crushing/screening operation. These two control methods are water and chemical dust suppressant. Chemical dust suppressant could be used on the area surrounding the crushing/screening operation and for emissions from the crushing/screening operation. However, because water is more readily available, is more cost effective, is equally effective as chemical dust suppressant, and is more environmentally friendly, water has been identified as the most appropriate method of pollution control of particulate emissions for the general plant area. In addition, water suppression has been required of recently permitted similar sources. A.M.Welles may, however, use chemical dust suppressant to assist in controlling particulate emissions from the surrounding plant area.

A.M.Welles shall not cause or authorize to be discharged into the atmosphere from any NSPS- affected crusher, any visible emissions that exhibit an opacity of 15% or greater averaged over 6 consecutive minutes. Also, A.M.Welles shall not cause or authorize to be discharged into the atmosphere from any affected screens, conveyor transfers, or other NSPS-affected equipment, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes. Further, A.M.Welles shall not cause or authorize to be discharged into the atmosphere from any non-NSPS affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.

A.M.Welles must also take reasonable precautions to limit the fugitive emissions of airborne particulate matter from haul roads, access roads, parking areas, and the general area of operation. A.M.Welles is required to have water spray bars and water available on site (at all times) and to apply the water, as necessary, to maintain compliance with the opacity and reasonable precaution limitations. A.M.Welles may also use chemical dust suppression, in order to maintain compliance with emission limitations in Section I.A of Permit #3804-00. The Department determined that using water spray bars, water, and chemical dust suppressant to maintain compliance with the opacity requirements and reasonable precaution limitations constitutes BACT for the crushing/screening operation.

B. Diesel Generators

Because of the lack of readily available/cost effective add-on controls, and the fact that the diesel generator is an existing generator manufactured in the early 1980's, the Department believes that add-on controls would be cost prohibitive. Therefore, The Department determined that proper operation and maintenance with no additional controls would constitute BACT for the diesel generator/engine.

The control options required for the proposed crushing/screening facility and for the diesel generator/engine are similar to other recently permitted similar sources.

IV. Emission Inventory

	Tons/Year					
Source	**PM**	**PM_{10}**	**NO_x**	**VOC**	**CO**	**SO_x**
Jaw Crusher (1 @ 400 TPH)	2.10	0.96				
Cone Crushers (2 @ 200 TPH each)	2.10	0.96				
Screens (1 @ 400 TPH, 2 @ 200 TPH)	7.70	2.62				
Truck Unloading	0.35	0.35				
Material Transfer	0.96	0.31				
Pile Forming	16.82	7.88				
Haul Roads	12.68	3.60				
Diesel Generator* (850 kW)	2.40	2.40	76.72	2.16	20.34	1.20
Total	**45.11**	**19.08**	**76.62**	**2.16**	**20.34**	**1.20**

*NOTE: Diesel Generator emissions restricted to below 80 TPY by restricting operation to 6,000 hours per rolling 12-months.

CRUSHERS - (SCC 3-05-030-03, controlled)
Jaw Crusher (400 TPH)

Process Rate: 400 tons/hr
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0012 lbs/ton (AP-42 Section 11.19.2-2 8/2004)
Calculations: 0.0012 lbs/ton * 400 tons/hr = 0.48 lbs/hr
0.48 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **2.10** tons/yr

PM-10 Emissions:

Emission Factor: 0.00054 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00054 lbs/ton * 400 tons/hr = 0.22 lbs/hr
0.22 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **0.96** tons/yr

Cone Crushers (2 @ 200 TPH each)

Process Rate: 400 tons/hr
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0012 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.0012 lbs/ton * 400 tons/hr = 0.48 lbs/hr
0.48 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **2.10** tons/yr

PM-10 Emissions:

Emission Factor: 0.00054 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00054 lbs/ton * 400 tons/hr = 0.22 lbs/hr
0.22 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **0.96** tons/yr

SCREENS - (SCC 3-05-020-02,-03, controlled)

Jaw Crusher Screen (400 TPH)

Process Rate: 400 tons/hr
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0022 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.0022 lbs/ton * 400 tons/hr = 0.88 lbs/hr
0.88 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **3.85** tons/yr

PM-10 Emissions:

Emission Factor: 0.00074 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00074 lbs/ton * 400 tons/hr = 0.30 lbs/hr
0.3 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **1.31** tons/yr

Cone Screens (2 @ 200 TPH each)

Process Rate: 400 tons/hr
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0022 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.0022 lbs/ton * 400 tons/hr = 0.88 lbs/hr
0.88 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **3.85** tons/yr

PM-10 Emissions:

Emission Factor: 0.00074 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00074 lbs/ton * 400 tons/hr = 0.30 lbs/hr
0.3 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **1.31** tons/yr

Material Transfer (SCC 3-05-020-06, controlled)

Truck Unloading (4)

Process Rate: 400 tons/hr
Number of Loads 4 Load
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 5.00E-05 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00005 lbs/ton * 400 tons/hr * 4 Load = 0.08 lbs/hr
0.08 lbs/hr * 8760 hr/yr * 0.0005 tons/lb = **0.35** tons/yr

PM-10 Emissions:

Emission Factor: 5.00E-05 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00005 lbs/ton * 400 tons/hr * 4 Load = 0.08 lbs/hr
0.08 lbs/hr * 8760 hr/yr * 0.0005 tons/lb = **0.35** tons/yr

Material Transfer (4)

Process Rate: 400 tons/hr
Number of Transfers 4 Transfers
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.00014 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.00014 lbs/ton * 400 tons/hr * 4 Transfers = 0.22 lbs/hr
0.22 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **0.96** tons/yr

PM-10 Emissions:

Emission Factor: 4.60E-05 lbs/ton (AP-42 Section 11.19.2-2, 8/2004)
Calculations: 0.000046 lbs/ton * 400 tons/hr * 4 Transfers 0.07 lbs/hr
0.07 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = **0.31** tons/yr

Pile Forming (3)

Process Rate: 400 tons/hr
Number of Piles 3 Piles
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0032 lbs/ton (AP-42 Section 13.2.4 (1/95))
Calculations: 0.0032 lbs/ton * 400 tons/hr * 3 Piles = 3.84 lbs/hr
3.84 lbs/hr * 8760 hr/yr * 0.0005 tons/lb = **16.82** tons/yr

PM-10 Emissions:

Emission Factor: 0.0015 lbs/ton (AP-42 Section 13.2.4 (1/95))
Calculations: 0.0015 lbs/ton * 400 tons/hr * 3 Piles = 1.80 lbs/hr
1.8 lbs/hr * 8760 hr/yr * 0.0005 tons/lb = **7.88** tons/yr

Haul Roads

Vehicle miles travelled (estimate) 5 VMT/day
Control Efficiency is included in Emission Factor

PM Emissions

Emission Factor (Rated Load Capacity <50 tons): 13.90 Lbs/VMT (AP-42 Section 13.2.2 (12/03))
Calculations: (5 VMT/day)(13.90 Lbs/VMT)"= 69.5 lb/day
12.68 tons/yr

PM10 Emissions:

Emission Factor (Rated Load Capacity <50 tons): 3.95 Lbs/VMT (AP-42 Section 13.2.2 (12/03))
Calculations: (5 VMT/day)(3.95 Lbs/VMT) 19.75 lb/day
3.60 tons/yr

Diesel Generator (850 kw)

Horsepower	1140	Hp		1	kw =	1.34	hp
Generator Size =	850	k					
BTU/hr	7.9	MMBTU/h		1	Hp-hr	7000	BT

PM Emissions — Hours of 6000 hrs/y

Emission Factor:	**0.1** lbs/MMBt (AP-42, 3.4-1, 10/96)		
Calculations	7.98 MMBTU/hr * 0.1 lbs/MMBtu =	0.8	lb/h
	0.8 lb/hr * 6000 hr/yr * 0.0005 tons/lb =	**2.4**	tons/yr

PM-10 Emissions

Emission Factor:	**0.1** lbs/MMBt (AP-42, 3.4-1, 10/96)		
Calculations	7.98 MMBTU/hr * 0.1 lbs/MMBtu =	0.8	lb/h
	0.8 lb/hr * 6000 hr/yr * 0.0005 tons/lb =	**2.4**	tons/yr

N_x

Emission Factor:	**3.2** lbs/MMBt (AP-42, 3.4-1, 10/96)		
Calculations	7.98 MMBTU/hr * 3.2 lbs/MMBtu =	25.5	lb/h
	25.54 lb/hr * 6000 hr/yr * 0.0005 tons/lb =	**76.6**	tons/yr

VOC Emissions

Emission Factor:	**0.0** lbs/MMBt (AP-42, 3.4-1, 10/96)		
Calculations	7.98 MMBTU/hr * 0.09 lbs/MMBtu =	0.7	lb/h
	0.72 lb/hr * 6000 hr/yr * 0.0005 tons/lb =	**2.1**	tons/yr

CO Emissions

Emission Factor:	**0.8** lbs/MMBt (AP-42, 3.4-1, 10/96)		
Calculations	7.98 MMBTU/hr * 0.85 lbs/MMBtu =	6.7	lb/h
	6.78 lb/hr * 6000 hr/yr * 0.0005 tons/lb =	**20.3**	tons/yr

S_x 0.0 %

Emission Factor:	**0.0** lbs/MMBt (AP-42, 3.4-1, 10/96)		
Calculations	7.98 MMBTU/hr 0.05 lbs/MMBtu =	0.4	lb/h
	0.4 lb/hr * 6000 hr/yr * 0.0005 tons/lb =	**1.2**	tons/yr

V. Existing Air Quality

Permit #3804-00 is issued for the operation of a portable crushing/screening facility to be originally located in Sections 17 and 18, Township 1 South, Range 5 East, in Gallatin County, Montana. This facility would be allowed to operate at this proposed site and any other areas designated as attainment or unclassified for all National Ambient Air Quality Standards (NAAQS); excluding those counties that have a Department-approved permitting program, those areas considered Tribal Lands, or those areas in or within 10 km of PM_{10} nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.* A.M.Welles will be required to obtain an addendum to this air quality permit to operate at locations in or within 10 km of PM_{10} nonattainment areas.

VI. Air Quality Impacts

This permit is for a portable crushing/screening plant to be located at various locations around Montana. This permit contains operational conditions and limitations that would protect air quality for this site and the surrounding area. Also, this facility is a portable source that would operate on an intermittent and temporary basis, so any effects to air quality will be minor and short-lived. Further, the Department performed ambient air quality modeling on the generator and believes that this facility will not cause or contribute to a violation of any ambient air quality standards.

VII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

VIII. Environmental Assessment

An environmental assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
1520 East Sixth Avenue
P.O. Box 200901
Helena, Montana 59620-0901
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued For: A.M.Welles, Inc.
PO Box 2808
Norris, MT 59745

Permit Number: 3804-00

Preliminary Determination Issued: 04/20/06
Department Decision Issued: 05/08/06
Permit Final: 05/24/06

1. *Legal Description of Site*: A.M.Welles submitted an application to operate a portable aggregate crushing/screening plant in Sections 17 and 18, Township 1 South, Range 5 East, in Gallatin County, Montana in the town of Belgrade.Montana. Permit #3804-00 would apply while operating at any location in Montana, except within those areas having a Department-approved permitting program, those areas considered tribal lands, or those areas in or within 10 km of PM_{10} nonattainment areas. *A Missoula County air quality permit would be required for locations within Missoula County, Montana.* An addendum to this air quality permit would be required for locations in or within 10 km of PM_{10} nonattainment areas.

2. *Description of Project*: The permit applicant proposes the construction and operation of a portable aggregate crushing/screening facility consisting of a Jaw Crusher and screen (400 tons per hour (TPH)), two cone crushers with screens (200 TPH each), an 850 kilowatt (kW) diesel generator, and associated equipment.

3. *Objectives of Project*: The object of the project would be to produce business and revenue for the company through the sale and use of aggregate. The issuance of Permit #3804-00 would allow A.M.Welles to operate the permitted equipment at various locations throughout Montana, including the proposed initial site location.

4. *Additional Project Site Information*: In many cases, this crushing/screening operation may move to a general site location or open cut pit, which has been previously permitted through the Industrial and Energy Minerals Bureau (IEMB). If this were the case, additional information for the site would be found in the Mined Land Reclamation Permit for that specific site.

5. *Alternatives Considered*: In addition to the proposed action, the Department considered the "no-action" alternative. The "no-action" alternative would deny issuance of the Montana Air Quality permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because A.M.Welles demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

6. *A Listing of Mitigation, Stipulations, and Other Controls*: A list of the enforceable permit conditions and a permit analysis, including a BACT analysis, would be contained in Permit #3804-00.

7. *Regulatory Effects on Private Property Rights*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined the permit conditions would be reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and would not unduly restrict private property rights.

8. *The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The "no action alternative" was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Terrestrial and Aquatic Life and Habitats			X			yes
B.	Water Quality, Quantity, and Distribution			X			yes
C.	Geology and Soil Quality, Stability, and Moisture			X			yes
D.	Vegetation Cover, Quantity, and Quality			X			yes
E.	Aesthetics			X			yes
F.	Air Quality			X			yes
G.	Unique Endangered, Fragile, or Limited Environmental Resource			X			yes
H.	Demands on Environmental Resource of Water, Air, and Energy			X			yes
I	Historical and Archaeological Sites				X		yes
J.	Cumulative and Secondary Impacts			X			yes

Summary of Comments on Potential Physical and Biological Effects: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Terrestrials would use the same area as the crushing/screening operations. Impacts on terrestrials and aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor, as the crushing/screening operations would be considered a minor source of emissions and would have intermittent and seasonal operations. Furthermore, the air emissions would have only minor effects on terrestrial and aquatic life because facility emissions would have good pollutant dispersion in the area of operations (see Section 8.F). Finally, the pit is existing and A.M.Welles is not planning to expand the footprint. Therefore, only minor and temporary effects to terrestrial and aquatic life and habitat would be expected from the proposed crushing/screening operation.

B. Water Quality, Quantity, and Distribution

Water would be required for dust suppression on the surrounding roadways and areas of operation and for pollution control for equipment operations. However, pollutant deposition and water use would only cause minor, if any, impacts to water resources in these areas because the facility is small and only a small volume of water would be required to be used (as described in

Section 8.F of this EA).

C. Geology and Soil Quality, Stability, and Moisture

The crushing/screening operations would have only minor impacts on geology and soil quality, stability, and moisture of soils. Only minor impacts from deposition of air pollutants on soils would result (as described in Section 8.F of this EA) and only minor amounts of water would be used for pollution control, and would be used, only as necessary, in controlling particulate emissions. Thus, only minimal water runoff would occur (as described in Section 8.B of this EA). Since only minor amounts of pollution would be generated and corresponding emissions would be widely dispersed before settling upon vegetation and surrounding soils (as described in Section 8.D of this EA), impacts would be minor. Finally, the pit is existing and A.M.Welles is not planning to expand the footprint. Therefore, any effects upon geology and soil quality, stability, and moisture from air pollutant emissions from equipment operations would be minor and short-lived.

D. Vegetation Cover, Quantity, and Quality

Minor impacts would occur on vegetative cover, quality, and quantity because the facility would operate in an area where vegetation has been previously disturbed. The pit is existing and A.M.Welles is not planning to expand the footprint, and the facility would be a small industrial operation. The facility would be a relatively minor source of emissions and the pollutants would be greatly dispersed (as described in Section 8.F of this EA); therefore, deposition on vegetation from the proposed project would be minor. Also, because the water usage would be minimal (as described in Section 8.B of this EA) and the associated soil disturbance from the application of water and water runoff would be minimal (as described in Section 8.C of this EA), corresponding vegetative impacts would be minor. Overall, impacts to vegetation cover, quality, and quantity would be minor.

E. Aesthetics

The crushing/screening operation would be visible and would create additional noise while operating at the proposed site. However, Permit #3804-00 would include conditions to control emissions, including visible emissions, from the operation. The crushing/screening operation would be portable, would operate on an intermittent and seasonal basis, and would be a small industrial source located at an existing pit area. Therefore, any visual aesthetic impacts would be short-lived and minor.

F. Air Quality

Air quality impacts from the proposed project would be minor because the facility would be relatively small and operate on an intermittent and temporary basis. Permit #3804-00 would include conditions limiting the facility's opacity and the facility's crushing/screening production. Permit #3804-00 would also require water and water spray bars be available on site and used to ensure compliance with opacity standards. Permit #3804-00 would also limit total emissions from the crushing/screening facility and any additional A.M.Welles equipment operated at the site to 250 tons/year or less, excluding fugitive emissions.

Further, the Department determined that the crushing/screening facility would be a minor source of emissions as defined under the Title V Operating Permit Program because the source's PTE was below the major source threshold level of 100 tons per year for any regulated pollutant. Pollutant deposition from the facility would be minimal because the pollutants emitted would be well controlled, widely dispersed (from factors such as wind speed and wind direction), and would have minimal deposition on the surrounding area. Therefore, air quality impacts from

operating the crushing/screening equipment in this area would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to any unique endangered, fragile, or limited environmental resources in the initial proposed area of operation (Sections 17 and 18, Township 1 South, Range 5 East, in Gallatin County, Montana in the town of Belgrade), contacted the Montana Natural Heritage Program (MNHP). Search results concluded there are four known species of concern within the area. The search area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer. The four species of concern are the Dwarf Purple Monkeyflower; A Stonefly; Small Dropseed; and Slender Wedgegrass.

While the four species may be found within a mile from the defined area, the project is not expected to have any significant effect on them. Specific effects of operating the crushing/screening operation in this area would be minor since the area is already disturbed, and would have only temporary operations in the area. Pollution controls would be required by this permit to ensure that emissions from the crushing/screening operation would be minimal. The Department determined that any effects upon the four species of concern would be minor and short-lived.

H. Demands on Environmental Resources of Water, Air, and Energy

The crushing/screening operation would only require small quantities of water, air, and energy for proper operation. Only small quantities of water would be required for dust suppression of emissions being generated at the site. In addition, impacts to air resources would be minor because the source is a minor industrial source of emissions, with intermittent and seasonal operations, and because air pollutants generated by the facility would be widely dispersed as described in Section 8.F of this EA. Energy requirements would also be relatively small, as the facility would be powered by one industrial diesel generator engine. Overall, any impacts to water, air, and energy resources would be minor.

I. Historical and Archaeological Sites

The Department contacted the Montana Historical Society - State Historical Preservation Office (SHPO) in an effort to identify any historical and/or archaeological sites that may be present in the proposed area of construction/operation. Search results concluded that there are no previously recorded historical or archaeological resources of concern within the area proposed for initial operations. According to the Montana State Historic Preservation Office, there would be a low likelihood of adverse disturbance to any known archaeological or historic site. Therefore, no impacts upon historical or archaeological sites would be expected as a result of operating the proposed crushing/screening plant.

J. Cumulative and Secondary Impacts

The crushing/screening operation would cause minor cumulative and secondary impacts to the physical and biological aspects of the human environment because the facility would generate relatively small amounts of emissions of PM, PM_{10}, NO_x, carbon monoxide (CO), volatile organic compounds (VOC) (including HAPs), and oxides of Sulfur (SO_x). Emissions and noise generated from the equipment would, at most, result in only minor impacts to the area of operations because the crushing/screening plant would be relatively small, seasonal, and temporary. The initial proposed project would be short-term in nature, and have minor cumulative effects upon resource within the area. This facility, in combination with other emissions from A.M.Welles's equipment operations would not be permitted to exceed 250 tons per year of non-fugitive emissions. Overall, cumulative and secondary impacts to the physical and biological aspects of the human

environment would be minor.

9. *The following table summarizes the potential economic and social effects of the proposed project on the human environment. The "no action alternative" was discussed previously.*

		Major	Moderate	Minor	None	Unknown	Comments Included
A.	Social Structures and Mores				X		yes
B.	Cultural Uniqueness and Diversity				X		yes
C.	Local and State Tax Base and Tax Revenue			X			yes
D	Agricultural or Industrial Production			X			yes
E.	Human Health			X			yes
F.	Access to and Quality of Recreational and Wilderness Activities			X			yes
G	Quantity and Distribution of Employment			X			yes
H.	Distribution of Population				X		yes
I.	Demands for Government Services			X			yes
J.	Industrial and Commercial Activity			X			yes
K.	Locally Adopted Environmental Plans and Goals			X			yes
L.	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The crushing/screening operation would not cause any disruption to the social structures and mores in the area because the source would be a minor industrial source of emissions, and would only have temporary and intermittent operations. Further, the facility would be required to operate according to the conditions that would be placed in Permit #3804-00, which would limit the effects to social structures and mores.

B. Cultural Uniqueness and Diversity

The cultural uniqueness and diversity of this area would not be impacted by the proposed crushing/screening operation because the facility would be a portable source, with seasonal and intermittent operations. The project site is located on private land that is already used as a gravel pit; therefore, the surrounding area would not change as a result of this crushing/screening operation. Therefore, the cultural uniqueness and diversity of the area would not be affected.

C. Local and State Tax Base and Tax Revenue

The crushing/screening operations would have little, if any, impact on the local and state tax base and tax revenue because the facility would be a minor industrial source of emissions and would have seasonal and intermittent operations. The facility may require an additional 2-3 employees. Only minor impacts to the local and state tax base and revenue could be expected from the employees and facility production. Furthermore, the impacts to local tax base and revenue would be minor because the source would be portable and the money generated for taxes would be widespread. Therefore, any impacts to the local and state tax base and tax revenue would be

minor.

D. Agricultural or Industrial Production

The crushing/screening operations would have only a minor impact on local industrial production since the facility would be a minor source of aggregate production and air emissions. Also, the facility would locate on private land located between the interstate and railroad tracks, on 30 acres of an existing commercial pit. Because minimal deposition of air pollutants would occur on the surrounding land (as described in Section 8.F of this EA), only minor and temporary effects on the surrounding vegetation (i.e. agricultural production) would occur. In addition, the facility operations would be small and temporary in nature and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation, as described in Section 8.D of this EA. Overall, the impacts to agricultural or industrial production from this facility would be minor.

E. Human Health

Permit #3804-00 would incorporate conditions to ensure that the crushing/screening facility would be operated in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 8.F. of this EA, the air emissions from this facility would be minimized by the use of water spray and other process limits that would be required by Permit #3804-00. Also, the facility would be operating on a temporary basis and pollutants would disperse from the ventilation of emissions at this site (see Section 8.F of this EA). Therefore, only minor impacts would be expected on human health from the proposed crushing/screening facility.

F. Access to and Quality of Recreational and Wilderness Activities

The site is situated in an area bounded by the highway and railroad, and another commercial pit. There are no known access routes to recreational or wilderness activities near the site. Noise from the facility would be minimal because the facility would be small. Also, the facility would operate on a seasonal and intermittent basis on private land and would be a relatively minor industrial source of emissions. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at this site would be expected to be minor and intermittent.

G. Quantity and Distribution of Employment

The portable crushing/screening operation would be relatively small, would have seasonal and intermittent operations, and would require 4 to 9 employees to operate, 2 to 3 more than presently employed at this site. Therefore, only a minor effect upon the quantity and distribution of employment in this area would be expected.

H. Distribution of Population

The portable crushing/screening operation would be small and would require 4 to 9 employees to operate, 2 to 3 more than presently employed at this site. No individuals would be expected to permanently relocate to this area of operation as a result of operating the crushing/screening facility. Therefore, the crushing/screening facility would not impact the normal population distribution in the initial area of operation or any future operating site.

I. Demands of Government Services

Minor increases would be seen in traffic on existing roadways in the area while the crushing/screening operation is in progress. In addition, government services would be required for acquiring the appropriate permits for the proposed project and to verify compliance with the

permits that would be issued. However, demands for government services would be minor, due to the relatively small size and seasonal nature of the crushing/screening facility.

J. Industrial and Commercial Activity

The crushing/screening operation would represent only a minor increase in the industrial activity in the proposed area of operation because the source would be a relatively small industrial source that would be portable and temporary in nature. No additional industrial or commercial activity would be expected as a result of the proposed operation. Therefore, any impacts to the industrial and commercial activity would be minor.

K. Locally Adopted Environmental Plans and Goals

A.M.Welles would be allowed, by Permit #3804-00, to operate in areas designated by EPA as attainment or unclassified for ambient air quality. An Addendum would be required to operate in or within 10 km of a PM_{10} nonattainment area. Permit #3804-00 would contain production and opacity limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards, as a locally adopted environmental plan or goal for operating at this proposed site. Because the facility would be a small and portable source and would have intermittent and seasonal operations, any impacts from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

The crushing/screening operations would only cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area of operation because the source would be a portable and temporary source. Further, no other industrial operations are expected to result from the permitting of this facility. Minor increases in traffic would have minor effects on local traffic in the immediate area. Because the source is relatively small and temporary, only minor economic impacts to the local economy would be expected from operating the facility. Further, this facility may be operated in conjunction with other equipment owned and operated by A.M.Welles, but any cumulative impacts upon the social and economic aspects of the human environment would be minor and short-lived. Thus, only minor and temporary cumulative effects would result to the local economy.

Recommendation: An EIS is not required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: All potential effects resulting from construction and operation of the proposed facility are minor; therefore, an EIS is not required.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Department of Environmental Quality - Permitting and Compliance Division (Industrial and Energy Minerals Bureau); Montana Natural Heritage Program; and the State Historic Preservation Office (Montana Historical Society).

Individuals or groups contributing to this EA: Montana Department of Environmental Quality (Air Resources Management Bureau, Montana State Historic Preservation Office (Montana Historical Society), and Montana Natural Heritage Program.

EA prepared by: Christine Weaver
Date: March 13, 2006